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11 Attorneys for Defendant
12 ALEXANDER SMIRNOV

13 UNITED STATES DISTRICT COURT
14 DISTRICT OF NEVADA

15 * * * * *

16 UNITED STATES OF AMERICA,)
17)
18 Plaintiff,)
19) CASE NO. 2:24-mj-00166-DJA
20 v.)
21)
22 ALEXANDER SMIRNOV,) DATE OF HEARING: FEB. 20, 2024
23) TIME OF HEARING: 3:00pm
24 Defendant,)
25 _____)
26)
27)
28)

29 **DEFENDANT'S RESPONSE TO GOVERNMENT'S MEMORANDUM IN SUPPORT OF**
30 **DETENTION**

31 COMES NOW, Defendant, ALEXANDER SMIRNOV, by and through his attorneys,
32 DAVID Z. CHESNOFF, ESQ., and RICHARD A. SCHONFELD, ESQ., of the law firm of
33 CHESNOFF & SCHONFELD and hereby Responds to the Government's Memorandum in
34 Support of Detention.

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1 This Response is made and based upon the attached Memorandum of Points and
2 Authorities, the argument of counsel, and any other such evidence as may be presented at the
3 time of hearing.

4 Dated this 20th day of February, 2024.

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6 Respectfully Submitted:

7 CHESNOFF & SCHONFELD

8 /s/ David Z. Chesnoff

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MEMORANDUM OF POINTS AND AUTHORITIES

Notwithstanding that counsel Chesnoff contacted out of state government counsel on Friday February 16, 2024, and asked to be apprised of any specific concerns that the government had related to its request for a continuance of the detention hearing, the government filed their Memorandum in Support of Detention this morning. While the Defendant cannot completely respond to the voluminous government filing, and will address the government assertions in court, there is one aspect that counsel will respond to herein.

On February 20, 2024, at approximately 1:00pm the undersigned counsel met with United States Pretrial Services Officer Emily McKillip who confirmed that Mr. Smirnov was only asked about his personal assets and not the business account.

Accordingly, the government's claim that "the fact that Smirnov misrepresented his assets alone should cause Smirnov to be detained..." is entirely misplaced and inaccurate.

DATED this 20th day of February, 2024.

Respectfully Submitted:

CHESNOFF & SCHONFELD

/s/ David Z. Chesnoff
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CERTIFICATE OF SERVICE

I hereby certify that on this 20th day of February, 2024, I caused the forgoing document to be filed electronically with the Clerk of the Court through the CM/ECF system for filing; and served on counsel of record via the Court's CM/ECF system.

/s/ Rosemary Reyes
Employee of Chesnoff & Schonfeld